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8 IN THE UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
10

11 UNITED STATES OF AMERICA,)	3:73-cv-00127-ECR-RAM
)	
12 Plaintiff,)	
)	IN EQUITY NO. C-125-RCJ
13 WALKER RIVER PAIUTE TRIBE,)	Subproceeding: C-125-B
)	
14 Plaintiff-Intervenor,)	
)	
15 v.)	MOTION FOR WITHDRAWAL
)	AS COUNSEL FOR
16 WALKER RIVER IRRIGATION)	LeROY JAMES PERRY' TRUST
17 DISTRICT, a corporation,)	
18 et al.,)	
)	
19 Defendants.)	
20)	

21
22 PLEASE TAKE NOTICE that LeRoy James Perry Trust, by and
23 through its attorneys, GEORGE M. KEELE, ESQ., of GEORGE M.
24 KEELE, A PROFESSIONAL CORPORATION, hereby moves this Court
25 for an order of withdrawal of counsel for LeRoy James Perry
26 Trust in the above-captioned matter. This motion is made and
27 based upon the Memorandum of Points and Authorities
28

1 submitted herein and the Affidavit of George M. Keele filed
2 concurrently herewith.

3 MEMORANDUM OF POINTS AND AUTHORITIES

4 LeRoy James Perry Trust brings this motion to proceed
5 as an "unrepresented party" in this matter. This motion is
6 brought pursuant to LR IA 11-6, and is supported by the
7 Affidavit of George M. Keele filed in conjunction herewith.
8

9 Local Rule IA 11-6(b) provides that "[n]o attorney may
10 withdraw after appearing in a case except by leave of the
11 court after notice has been served on the affected client
12 and opposing counsel." George M. Keele has corresponded with
13 LeRoy James Perry Trust as to this withdrawal, and he will
14 provide a copy of the instant motion to LeRoy James Perry
15 Trust. Further, all other counsel and parties in this case
16 will receive notice of this motion as described in the
17 certificate of service attached hereto.
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19 Local Rule IA 11-6(e) further states "no withdrawal or
20 substitution will be approved if it will result in delay of
21 discovery, the trial, or any hearing in the case." No delay
22 of any kind will result from the withdrawal of George M.
23 Keele, Esq., as attorney for LeRoy James Perry Trust, as
24 LeRoy James Perry Trust will continue to participate as an
25 "Unrepresented Party" as defined in this Court's March 8,
26
27
28

1 2019, Order Discontinuing Service by Postcard Notice (ECF
2 No. 2439).

3 LeRoy James Perry Trust has provided the following
4 contact information to continue as an Unrepresented Party,
5 and requests addition to the electronic service list to
6 receive service of documents at the following address:
7

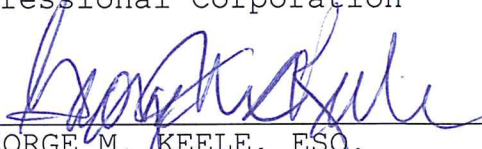
8 jimp37321@gmail.com
9 LeRoy James Perry, Trustee
10 P.O. Box 242
Minden, NV 89423

11 CONCLUSION

12 For the reasons set forth above, George M. Keele, of
13 George M. Keele, A Professional Corporation, hereby requests
14 an order from the Court to withdraw as counsel for LeRoy
15 James Perry Trust. A Proposed Order is attached hereto as
16 Exhibit 1.
17

18 Dated: December 23, 2019.

19 GEORGE M. KEELE,
20 A Professional Corporation

21 By: 
22 GEORGE M. KEELE, ESQ.
23 Nevada Bar No. 4804
24 Attorney for LeRoy James
25 Perry Trust
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CERTIFICATE OF SERVICE

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I certify that I am an employee of George M. Keele, A Professional Corporation, and that on the 27th day of December, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record.

I further certify that I placed in the U.S. Mail a copy of the foregoing, postage paid, addressed to:

James Perry
P.O. Box 242
Minden, NV 89423


Mary E. Baldecchi